

REMARKS

The examiner is thanked for the performance of a thorough search. By this amendment, Claims 1 and 26 have been amended. No claims have been cancelled or added. Hence, Claims 1-33 are pending in the application. The amendments to the claims as indicated herein do not add any new matter to this application. Furthermore, amendments made to the claims as indicated herein have been made to exclusively improve readability and clarity of the claims and not for the purpose of overcoming alleged prior art.

Each issue raised in the Office Action mailed June 24, 2005 is addressed hereinafter.

I. SUMMARY OF THE REJECTIONS

Claims 1-8, 11-19, and 22-31 are rejected under 35 U.S.C. § 102(e) as allegedly anticipated by *Kekic* et al. (U.S. Patent No. 6,664,978; hereinafter "*Kekic*"). The rejection is respectfully traversed.

Claims 9-10, 20-21, and 32-33 are rejected under 35 U.S.C. § 103(a) as allegedly being obvious over *Kekic* in view of Crocker ("Augmented BNF for Syntax Specifications: ABNF"; hereinafter "*Crocker*").

II. ISSUES RELATING TO PRIOR ART

Claims 1-8, 11-19, and 22-31 are rejected under 35 U.S.C. § 102(e) as allegedly anticipated by *Kekic*. The rejection is respectfully traversed.

A. CLAIM 1

Claim 1 recites:

A method of managing network devices by specifying device components using a parsable string that conforms to a specified grammar, the method comprising the computer steps of:

creating and storing one or more entity location specifier values each comprising one or more location elements;

wherein the one or more entity location specifier values are specified as parsable strings;  
wherein the parsable strings conform to the specified grammar;  
wherein each of the one or more location elements is selected from a superset of location elements that specify locations of entities within one or more network devices;  
receiving a retrieval request for a particular entity location specifier value; and  
transmitting the particular entity location specifier value to the application.

The Office Action asserts that *Kekic* “discloses...one or more entity location specifier values each comprising one or more location elements.” This is incorrect. As evidence of this teaching, the Office Action cites Figures 10 and 39 of *Kekic*. Figure 10 illustrates a “process flow diagram for building the basis information in an element manager” (col. 9, lines 55-56). Figure 39 is an illustration of a server Remote Method Invocation (RMI) object class hierarchy (col. 13, lines 10-11). Nothing in the figures or the accompanying text teaches or suggests anything remotely about entity location specifier values or location elements, much less an entity location specifier value comprising location elements.

The Office Action alleges that *Kekic* “discloses...one ore more entity location specific [sic] values are specified as parsable strings.” This is also incorrect. The paragraphs in *Kekic* cited by the Office Action suggest nothing like entity location specifier values and parsable strings. Specifically, the cited paragraphs disclose a set of agent processes that reside on network devices (col. 2, lines 25-28) where each process responds to network management requests and has the ability to send messages to a network manager (col. 2, lines 40-42). The cited paragraphs further teach that a Management Information Base (MIB) resides on each network element (FIG. 1; col. 2, lines 33-37) and that MIB objects are grouped according to functionality and categorized in a tree-like data structure (col. 2, lines 61-67). Again, entity location specifier values are completely absent from any discussion in these cited paragraphs. Furthermore, the cited paragraphs mention nothing about strings, much less parsable strings.

Lastly, the Office Action alleges that *Kekic* teaches that “the parsable strings conform to a specified grammar,” as taught by Claim 1. The Office Action makes reference to Table 2 of *Kekic* as evidence of this assertion. This is also incorrect. Table 2 simply illustrates the possible unsolicited messages that an SNMP agent can initiate when a “significant” network event occurs (col. 3, lines 62-64). The table lists seven significant events in one column with an accompanying description of the events in the second column. Not only is this description not a grammar, but *Kekic* itself does not maintain such. A grammar is the formal definition of the syntactic structure of a language. Rather than defining the syntactic structure of a language, Table 2 simply describes significant network events.

Based on the foregoing, *Kekic* fails to disclose, teach, or suggest all the elements of Claim 1. It is therefore respectfully submitted that Claim 1 is patentable over *Kekic*.

B. CLAIMS 13, 25-31

Independent Claims 13, 25-31 are based on Claim 1 and recite elements of Claim 1 that are patentable over *Kekic* discussed above. It is therefore respectfully submitted that Claims 13, 25-31 are also patentable over *Kekic* for the same reasons cited above for Claim 1.

C. CLAIMS 2-8, 11, 12, 14-19, and 22-24

Claims 2-8, 11, 12, 14-19, and 22-24 not discussed so far are dependent claims that depend on either independent Claim 1 or Claim 13 discussed above. Because each of the dependent claims includes the limitations of the claim upon which they depend, the dependent claims are patentable for at least those reasons given above for Claims 1 and 13. Removal of the rejections with respect to the dependent claims and allowance of the dependent claims is respectfully requested. In addition, the dependent claims introduce additional limitations that independently render them patentable. However, due to the fundamental differences already

identified for independent Claims 1 and 13, a separate discussion of those limitations are not included at this time.

D. Claims 9-10, 20-21, and 32-33

Claims 9-10, 20-21, and 32-33 are rejected under 35 U.S.C. § 103(a) as allegedly being obvious over *Kekic* in view of *Crocker*.

Claims 9-10 and 20-21 depend on Claims 1 and 13, respectively, either directly or indirectly. Thus, they incorporate all the elements of Claims 1 and 13, respectively. Thus, even if *Crocker* discloses the added elements of Claims 9-10, and 20-21 pertaining to ABNF as the Office Action alleges, the combination of *Kekic* and *Crocker* still fails to teach all the elements of Claims 9-10, and 20-21. It is therefore respectfully submitted that Claims 9-10, and 20-21 are patentable over *Kekic* in view of *Crocker*.

Claims 32 and 33 are independent method claims that recite the elements of entity location specifier values, location elements, and parsable strings discussed above in reference to Claim 1. Thus, even if *Crocker* discloses the added elements of Claims 32 and 33 pertaining to ABNF as the Office Action asserts, the combination of *Kekic* and *Crocker* fails to teach all the elements of Claims 32 and 33. It is therefore respectfully submitted that Claims 32 and 33 are patentable over *Kekic* in view of *Crocker*.

III. CONCLUSIONS & MISCELLANEOUS

For the reasons set forth above, all of the pending claims are now in condition for allowance. The Examiner is respectfully requested to contact the undersigned by telephone relating to any issue that would advance examination of the present application.

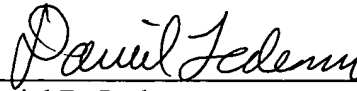
A petition for extension of time, to the extent necessary to make this reply timely filed, is hereby made. If applicable, a law firm check for the petition for extension of time fee is enclosed

herewith. If any applicable fee is missing or insufficient, throughout the pendency of this application, the Commissioner is hereby authorized to any applicable fees and to credit any overpayments to our Deposit Account No. 50-1302.

Respectfully submitted,

HICKMAN PALERMO TRUONG & BECKER LLP

Dated: September 29, 2005



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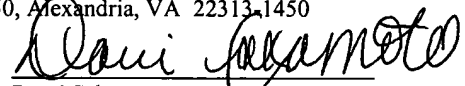
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I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail in an envelope addressed to: Mail Stop Amendment, Commissioner for Patents, P. O. Box 1450, Alexandria, VA 22313-1450

on September 29, 2005

by

  
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